

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BETHANY KATZ, *individually and on behalf
of those similarly situated,*

Plaintiffs,

v.

DNC SERVICES CORP., *et al.*,

Defendant.

No: 16-5800

**DECLARATION OF JUSTIN SWIDLER IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF THE CLASS AND COLLECTIVE ACTION
SETTLEMENT AND RELATED RELIEF**

I, JUSTIN L. SWIDLER, declare as follows:

1. I am a founding partner of the law firm of Swartz Swidler, LLC ("Swartz Swidler"), and I represent Plaintiffs and the certified class in the above-captioned matter.

2. During the Final Fairness Hearing, the Court requested that I submit a further detailed explanation of the costs for which my Firm seeks to be reimbursed. I provided a summary of the costs in my declaration filed at ECF Doc. 248-2, which total: \$10,776.41. Here, I provide a more detailed explanation of the costs. I have not changed any of the amounts requested.

3. As provided in the Motion for Final Approval, the largest cost relates to costs paid to Angeion Group, LLC, who administered the initial FLSA notice following conditional certification and acted as administrator prior to the Court's preliminary approval of the Class And Collective Settlement. My firm incurred the following costs to Angeion, which total: \$6,540.36:

Date	Invoice Number	Amount
6/30/2021	Angeion: NY005959	\$5,305.87
7/31/2021	Angeion: NY006100	\$ 330.30

8/31/2021	Angeion: NY006271	\$ 27.04
9/30/2021	Angeion: NY006398	\$ 76.10
10/31/2021	Angeion: NY006565	\$ 27.04
11/30/2021	Angeion: NY006784	\$ 72.04
12/31/2021	Angeion: NY006962	\$ 64.54
1/31/2022	Angeion: NY007024	\$ 42.04
2/28/2022	Angeion: NY007150	\$ 27.04
10/31/2022	Angeion: NY008445	\$ 243.36
12/31/2022	Angeion: NY008835	\$ 54.71
1/31/2023	Angeion: NY008974	\$ 214.76
2/28/2023	Angeion: NY009141	\$ 27.76
3/31/2023	Angeion: NY009302	\$ 27.76

4. My firm seeks to be reimbursed \$2,000 in mediation costs paid to JUSTUS ADR for Mediation Services provided by Judge Benson. My firm paid this amount on April 28, 2022, pursuant to Invoice Number 22-058A.

5. My Firm seeks to be reimbursed \$1,443 for internet hosting and domain registrations related to this action. This breaks down as follows:

- a. My firm registered the domain name www.dncovertimelawsuit.com with GoDaddy on November 11, 2016 when the case website went live. GoDaddy charges \$39.98/2 years, for which my firm has paid \$159.92 to date (on November 11 on each even year since). Additionally, on April 10, 2021, my firm registered the domain

name www.pdpovertimelawsuit.com with Google, and pays \$12/year for such registration, for which my firm has paid \$36 to date (on April 10 of each year since 2021). In total, my firm has incurred domain registration fees of: \$195.92 to date.

- b. My Firm maintained a case website and online consent form since November of 2016. The site is hosted on our web server for which my firm pays \$99.98/month (which is paid on the 25th of each month to Digital Marketing), or \$1,199.76/year. The case website has been online for 7 years, for which my Firm has paid \$8,398.32 for hosting. However, because the hosting expenses are shared on our web server with other cases, we have sought to be reimbursed only 15% of such costs from this settlement, totaling: \$1,247.08.
- c. Additionally, further demonstrating the reasonableness of this request, my Firm has not sought to be reimbursed with any of the internet hosting costs or domain registration costs which we will reasonably incur through the end of 2029. I expect those costs to be: \$191.94 for domain registration and \$7,198.56 for internet hosting (15% of which would be: \$1,079.78).

6. My firm seeks to be reimbursed \$754 for the filing fee and payments made to process servers in this matter. Those costs are as follows:

Date	Invoice	Amount
02/01/2017	Archer Investigative Group: Inv #1761-Katz,et al. v DNC Services Corp,et al.-Service	\$ 50.00

01/31/2017	Earegood Court Services: Service: Katz, Bethany et al. v DNC Svcs Corp dba Democratic Ntl Convention	\$ 45.00
01/31/2017	Foxmore Process Service: Service: Katz v DNC	\$ 55.00
01/31/2017	ASAP Service LLC: Service to Katz v DNC	\$ 69.00
12/09/2016	Information Network Assoc: Inv #116466-Katz, Bethany v DNC Svcs Corp dba Democratic Ntl Committee-svc	\$ 60.00
12/01/2016	Same Day Process Service 202-398 .	\$ 75.00
11/09/2016	COURTS/USDC-PA-E-PG 267-299-7106 Filing Fee	\$ 400.00

7. My Firm seeks to be reimbursed for parking and mileage of \$39.05. These costs were incurred in attending the July 31, 2017 Conference in Philadelphia before Judge Jones (ECF Doc. 112). My Firm did not seek reimbursement for other parking/mileage costs, including mileage/parking related to today's hearing.

8. I make these statements based on personal knowledge and would so testify if called as a witness at trial.

1. I declare, under penalties of perjury, that the foregoing is true to the best of my information and belief.

Respectfully submitted,

/s/ Justin L. Swidler

Justin L. Swidler, Esq.

Dated: October 17, 2023

